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Attorneys for Defendant
RAMESH "SUNNY" BALWANI

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

RAMESH "SUNNY" BALWANI,

Defendant.

Case No. 18-CR-00258-EJD

**DECLARATION OF JEFFREY B.
COOPERSMITH RE: DEFENDANT'S
MOTION TO COMPEL LIS
EVIDENCE**

Judge: Honorable Edward J. Davila

DECLARATION OF JEFFREY B. COOPERSMITH

I, Jeffrey B. Coopersmith, declare as follows:

1. I am lead counsel for defendant Ramesh “Sunny” Balwani, an attorney admitted to practice in the State of California, a partner at the law firm of Orrick, Herrington & Sutcliffe LLP, and counsel of record for Mr. Balwani. I submit this declaration in support of Mr. Balwani’s motion to compel the production of evidence concerning Theranos’ Laboratory Information System (LIS).

2. Attached as **Exhibit 1** is a copy of excerpts of an October 29, 2020 letter signed by Assistant United States Attorney Robert Leach and addressed to counsel for Ms. Holmes with myself copied. The letter has been redacted to protect the privacy of uncharged individuals.

3. Attached as **Exhibit 2** is a copy of a March 30, 2020 letter I wrote to counsel for the government.

4. Attached as **Exhibit 3** is a copy of an April 1, 2022 email from Assistant United States Attorney Robert Leach responding to the defense’s March 30, 2020 letter.

I declare under penalty of perjury that the foregoing is true and correct.

Executed March 4, 2022, at San Jose, California.

/s/ Jeffrey B. Coopersmith
JEFFREY B. COOPERSMITH